

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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GOVERNMENT EMPLOYEES INSURANCE
COMPANY, GEICO INDEMNITY COMPANY,
GEICO GENERAL INSURANCE COMPANY
and GEICO CASUALTY COMPANY,

Docket No. 22-CV-02834 (PKC-MMH)

Plaintiffs,

-against-

ELENA BORISOVNA STYBEL, D.O.,
ELENA BORISOVNA STYBEL, M.D.
(A Sole Proprietorship), EVERGREEN &
REMEGONE, LLC, YANA MIRONOVICH,
NEW YORK BILLING AND PROCESSING
CORP., ERIC MELADZE, BLUE TECH
SUPPLIES, INC., SUNSTONE SERVICES and
JOHN DOE DEFENDANTS “1” through “10”,

Defendants.

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**DEFENDANT ELENA BORISOVNA STYBEL, D.O. AND ELENA BORISOVNA
STYBEL, M.D.’S ANSWER WITH AFFIRMATIVE DEFENSES TO PLAINTIFF
GOVERNMENT EMPLOYEES INSURANCE COMPANY, GEICO INDEMNITY
COMPANY, GEICO GENERAL INSURANCE COMPANY
AND GEICO CASUALTY COMPANY’S FIRST AMENDED COMPLAINT**

Elena Borisovna Stybel, D.O. and Elena Borisovna Stybel, M.D. (collectively
“Defendants”), for their Answer to Government Employees Insurance Company, GEICO
Indemnity Company, GEICO General Insurance Company and GEICO Casualty
Company (collectively “Plaintiffs”) Complaint state the following:

NATURE OF ACTION

- 1: Paragraph 1 of the Complaint purports to identify the Plaintiffs' legal theories in the instant action and therefore no response from the Defendants is required.
- 2: Paragraph 2 of the Complaint purports to identify the Plaintiffs' legal theories in the instant action and therefore no response from the Defendants is required.
- 3: Defendants admit she is a New York physician who has operated a sole proprietorship while denying knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 3 of the Complaint.
- 4: Defendants deny the truth of the allegations in Paragraph 4 of the Complaint.
- 5: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 5 of the Complaint.
- 6: Defendants deny the truth of the allegations in Paragraph 6 of the Complaint.
- 7: Defendants deny having knowledge or information sufficient to form a belief as to the allegations pertaining to the New York Department of Financial Services while denying the truth of the remaining allegations in Paragraph 7 of the Complaint.
- 8: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 8 of the Complaint.
- 9: Defendants deny the truth of the allegations in Paragraph 9 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.
- 10: Defendants deny the truth of the allegations in Paragraph 9 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

11: Defendants deny the truth of the allegations in Paragraph 9 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

12: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 12 of the Complaint.

13: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13 of the Complaint.

14: 15: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15 of the Complaint.

16: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16 of the Complaint.

17: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 17 of the Complaint.

18: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 18 of the Complaint.

19: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 19 of the Complaint.

20: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 20 of the Complaint.

21: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 21 of the Complaint.

22: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22 of the Complaint.

23: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 23 of the Complaint.

24: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 24 of the Complaint.

25: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 25 of the Complaint.

26: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 26 of the Complaint.

27: Defendants deny the truth of the allegations in Paragraph 27 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

28: Defendants deny the truth of the allegations in Paragraph 28 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

29: Defendants deny the truth of the allegations in Paragraph 29 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

THE PARTIES

30: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 30 of the Complaint.

31: Defendants admit she is a New York physician who has operated a sole proprietorship while denying the truth of the remaining allegations in Paragraph 31 of the Complaint.

32: Defendants admit the truth of the allegations in Paragraph 32 of the Complaint.

33: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 33 of the Complaint.

34: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 34 of the Complaint.

35: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 35 of the Complaint.

36: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36 of the Complaint.

37: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 37 of the Complaint.

38: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 38 of the Complaint.

39: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 39 of the Complaint.

JURISDICTION AND VENUE

40: The burden of proof to establish that jurisdiction is proper with respect to the allegations in Paragraph 40 of the Complaint is with Plaintiffs and not on Defendants. All of said allegations are subject to the Court's determination of the statutes cited and related decisional authority.

41: The burden of proof to establish that jurisdiction is proper with respect to the allegations in Paragraph 41 of the Complaint is with Plaintiffs and not on Defendants.

All of said allegations are subject to the Court's determination of the statutes cited and related decisional authority.

42: The burden of proof to establish that venue is proper with respect to the allegation in Paragraph 42 of the Complaint is with Plaintiffs and not on Defendants. All of said allegations are subject to the Court's determination of the statutes cited and related decisional authority.

ALLEGATIONS COMMON TO ALL CLAIMS

43: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 43 of the Complaint.

44: Defendants proffer that the allegations contained in Paragraph 44 of the Complaint referencing a statute are subject to the Court's interpretation and related decisional authority.

45: Defendants proffer that the allegations contained in Paragraph 45 of the Complaint referencing a statute are subject to the Court's interpretation and related decisional authority.

46: Defendants proffer that the allegations contained in Paragraph 46 of the Complaint referencing a statute are subject to the Court's interpretation and related decisional authority.

47: Defendants proffer that the allegations contained in Paragraph 47 of the Complaint referencing a statute are subject to the Court's interpretation and related decisional authority.

48: Defendants proffer that the allegations contained in Paragraph 48 of the Complaint referencing a statute are subject to the Court's interpretation and related decisional authority.

49: Defendants proffer that the allegations contained in Paragraph 49 of the Complaint citing a statute are subject to the Court's interpretation and related decisional authority.

50: Defendants proffer that the allegations contained in Paragraph 50 of the Complaint referencing a statute are subject to the Court's interpretation and related decisional authority.

51: Defendants proffer that the allegations contained in Paragraph 51 of the Complaint referencing a statute are subject to the Court's interpretation and related decisional authority.

52: Defendants proffer that the allegations contained in Paragraph 52 of the Complaint referencing a statute are subject to the Court's interpretation and related decisional authority.

53: Defendants proffer that the allegations contained in Paragraph 53 of the Complaint referencing a statute are subject to the Court's interpretation and related decisional authority.

54: Defendants proffer that the allegations contained in Paragraph 54 of the Complaint referencing a statute are subject to the Court's interpretation and related decisional authority.

55: Defendants proffer that the allegations contained in Paragraph 55 of the Complaint referencing certain judicial decisions are subject to the Court's interpretation and related decisional authority

56: Defendants proffer that the allegations contained in Paragraph 56 of the Complaint citing a statute are subject to the Court's interpretation and related decisional authority.

57: Defendants proffer that the allegations contained in Paragraph 57 of the Complaint referencing a statute are subject to the Court's interpretation and related decisional authority.

58: Defendants proffer that the allegations contained in Paragraph 58 of the Complaint referencing a statute are subject to the Court's interpretation and related decisional authority.

59: Defendants proffer that the allegations contained in Paragraph 59 of the Complaint referencing a statute are subject to the Court's interpretation and related decisional authority.

60: Defendants proffer that the allegations contained in Paragraph 60 of the Complaint citing a statute are subject to the Court's interpretation and related decisional authority.

61: Defendants admit the truth of the allegations in Paragraph 61 of the Complaint.

62: Defendants admit the truth of the allegations in Paragraph 62 of the Complaint.

63: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 63 of the Complaint.

64: Defendants admit the existence of her prior involvement with certain medical professional corporations while denying the truth of the remaining allegations in Paragraph 64 of the Complaint.

65: Defendants deny the truth of the allegations in Paragraph 65 of the Complaint.

66: Defendants deny the truth of the allegations in Paragraph 66 of the Complaint.

67: Defendants deny the truth of the allegations in Paragraph 67 of the Complaint.

68: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 68 of the Complaint.

69: Defendants deny the truth of the allegations in Paragraph 69 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

70: Defendants deny the truth of the allegations in Paragraph 70 of the Complaint.

71: Defendants deny the truth of the allegations in Paragraph 71 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

72: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 72 of the Complaint.

73: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 73 of the Complaint.

74: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 74 of the Complaint.

75: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 75 of the Complaint.

76: Defendants deny the truth of the allegations in Paragraph 76 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

77: Defendants deny the truth of the allegations in Paragraph 77 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

78: Defendants deny the truth of the allegations in Paragraph 78 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

79: Defendants deny the truth of the allegations in Paragraph 79 of the Complaint.

80: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 80 of the Complaint.

81: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 81 of the Complaint.

82: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 82 of the Complaint.

83: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 83 of the Complaint.

84: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 84 of the Complaint.

85: Defendants deny the truth of the allegations in Paragraph 85 of the Complaint.

86: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 86 of the Complaint.

87: Defendants deny the truth of the allegations in Paragraph 87 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

88: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 88 of the Complaint.

89: Defendants deny the truth of the allegations in Paragraph 89 of the Complaint.

90: Defendants deny the truth of the allegations in Paragraph 90 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

91: Defendants deny the truth of the allegations in Paragraph 91 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

92: Defendants deny the truth of the allegations in Paragraph 92 of the Complaint.

93: Defendants deny the truth of the allegations in Paragraph 93 of the Complaint.

94: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 94 of the Complaint.

95: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95 of the Complaint.

96: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 96 of the Complaint.

97: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 97 of the Complaint.

98: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 98 of the Complaint.

99: Defendants deny the truth of the allegations in Paragraph 99 of the Complaint.

100: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 100 of the Complaint.

101: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 101 of the Complaint.

102: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 102 of the Complaint.

103: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 103 of the Complaint.

104: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 104 of the Complaint.

105: Defendants deny the truth of the allegations in Paragraph 105 of the Complaint.

106: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 106 of the Complaint.

107: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 107 of the Complaint.

108: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 108 of the Complaint.

109: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 109 of the Complaint.

110: Defendants proffer that the allegations contained in Paragraph 110 of the Complaint citing a law are subject to the Court's interpretation and related decisional authority.

111: Defendants proffer that the allegations contained in Paragraph 111 of the Complaint citing DOI Opinion Letters are subject to the Court's interpretation and related decisional authority.

112: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 112 of the Complaint.

113: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 113 of the Complaint.

114: Defendants deny the truth of the allegations in Paragraph 114 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

115: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 115 of the Complaint.

116: Defendants deny the truth of the allegations in Paragraph 116 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

117: Defendants deny the truth of the allegations in Paragraph 117 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

118: Defendants deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 118 of the Complaint.

119: Defendants proffer that the allegations contained in Paragraph 119 of the Complaint referencing legal as well as ethical obligations are subject to the Court's interpretation and related decisional authority.

120: Defendants deny the truth of the allegations in Paragraph 117 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

121: Defendants deny the truth of the allegations in Paragraph 121 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

122: Defendants deny the truth of the allegations in Paragraph 122 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

123: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 123 of the Complaint.

124: Defendants deny the truth of the allegations in Paragraph 124 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of GEICO's representations related to discovery of its alleged damages in Paragraph 124 of the Complaint.

AS AND FOR A FIRST CAUSE OF ACTION

Against Stybel and the Stybel Practice

(Declaratory Judgment – 28 U.S.C. §§ 2201 and 2202)

125: Defendants incorporate, as through fully set forth herein, each and every response in paragraphs 1-124 as if fully set forth at length herein.

126: Defendants deny having knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 126 of the Complaint.

127: Defendants deny the truth of the allegations in Paragraph 127 of the Complaint.

128: Defendants deny the truth of the allegations in Paragraph 128 of the Complaint.

129: Defendants deny the truth of the allegations in Paragraph 129 of the Complaint.

130: Defendants deny the truth of the allegations in Paragraph 130 of the Complaint.

131: Defendants deny the truth of the allegations in Paragraph 131 of the Complaint.

132: Defendants deny the truth of the allegations in Paragraph 132 of the Complaint.

133: Defendants deny the truth of the allegations in Paragraph 133 of the Complaint.

AS AND FOR A SECOND CAUSE OF ACTION

Against Stybel, the Testing Defendants, Laundering Defendants and John Doe Defendants

(Violation of RICO, 18 U.S.C. § 1962(c))

134: Defendants incorporate, as through fully set forth herein, each and every response in paragraphs 1-133 as if fully set forth at length herein.

135: Defendants deny the truth of the allegations in Paragraph 135 of the Complaint.

136: Defendants deny the truth of the allegations in Paragraph 136 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

137: Defendants deny the truth of the allegations in Paragraph 137 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

138: Defendants deny the truth of the allegations in Paragraph 138 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

139: Defendants deny the truth of the allegations in Paragraph 139 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

140: Defendants deny the truth of the allegations in Paragraph 140 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

AS AND FOR A THIRD CAUSE OF ACTION

Against Stybel, the Testing Defendants, Laundering Defendants and John Doe Defendants

(Violation of RICO, 18 U.S.C. § 1962(d))

141: Defendants incorporate, as through fully set forth herein, each and every response in paragraphs 1-140 as if fully set forth at length herein.

142: Defendants deny the truth of the allegations in Paragraph 142 of the Complaint.

143: Defendants deny the truth of the allegations in Paragraph 143 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

144: Defendants deny the truth of the allegations in Paragraph 144 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

145: Defendants deny the truth of the allegations in Paragraph 145 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

146: Defendants deny the truth of the allegations in Paragraph 146 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

AS AND FOR A FOURTH CAUSE OF ACTION

Against All Defendants

(Common Law Fraud)

147: Defendants incorporate, as through fully set forth herein, each and every response in paragraphs 1-146 as if fully set forth at length herein.

148: Defendants deny the truth of the allegations in Paragraph 148 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

149: Defendants deny the truth of the allegations in Paragraph 149 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

150: Defendants deny the truth of the allegations in Paragraph 150 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

151: Defendants deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 151 of the Complaint.

152: Defendants deny the truth of the allegations in Paragraph 152 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

153: Defendants deny the truth of the allegations in Paragraph 153 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

AS AND FOR A FIFTH CAUSE OF ACTION

Against All Defendants

(Unjust Enrichment)

154: Defendants incorporate, as through fully set forth herein, each and every response in paragraphs 1-153 as if fully set forth at length herein.

155: Defendants deny the truth of the allegations in Paragraph 155 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

156: Defendants deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 156 of the Complaint.

157: Defendants deny the truth of the allegations in Paragraph 157 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

158: Defendants deny the truth of the allegations in Paragraph 158 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

159: Defendants deny the truth of the allegations in Paragraph 159 of the Complaint while denying knowledge or information sufficient to form a belief as to the truth of said allegations against the remaining defendants.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

Assuming any of the Plaintiffs referenced in the Complaint suffered damages, which is denied, such damages were caused or contributed to by persons, conditions, or events beyond the control of Defendants and Defendants are not liable therefrom.

SECOND AFFIRMATIVE DEFENSE

The Plaintiffs referenced in the Complaint failed to take reasonable steps to mitigate any alleged damages, if any.

THIRD AFFIRMATIVE DEFENSE

The Plaintiffs referenced in the Complaint were contributorily and/or comparatively negligent.

FOURTH AFFIRMATIVE DEFENSE

The Complaint fails to state any cause of action upon which relief can be granted against the Defendants.

RELIEF REQUESTED

WHEREFORE, Defendants respectfully requests that the Court:

- A. Dismiss the Complaint in its entirety;
- B. Award costs and disbursements of defending this action; and
- C. Grant such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Defendants hereby demands a jury trial pursuant to FRCP Rule 38.

Dated: April 13, 2023

Respectfully Submitted,
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